

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

KELLY VIRGIL ANDERSON and  
CONNIE JO ANDERSON

**INDICTMENT**

Case No. \_\_\_\_\_

Violations: 18 U.S.C. §§ 658 and 2

**Conversion of Mortgaged or Pledged Property**

The Grand Jury Charges:

Between in or about July 2014 through August 2017, in the District of North  
Dakota,

KELLY VIRGIL ANDERSON and  
CONNIE JO ANDERSON,

individually, and by aiding and abetting one another, with intent to defraud, did  
knowingly conceal, remove, dispose of, and convert to their own use, property, to wit:  
cattle, which were purchased as mortgaged collateral and pledged to the Farm Service  
Agency as security on a Farm Service Agency loan for KELLY VIRGIL ANDERSON  
and CONNIE JO ANDERSON; further KELLY VIRGIL ANDERSON and CONNIE JO  
ANDERSON, without the knowledge, consent, and approval of the Farm Service  
Agency, purchased and converted cattle in the amount of approximately \$192,866.35 that

were purchased and pledged as collateral to secure a farm loan for KELLY VIRGIL ANDERSON and CONNIE JO ANDERSON with the Farm Service Agency;

In violation of Title 18, United States Code, Sections 658 and 2.

A TRUE BILL:

/s/ Grand Jury Foreperson  
Foreperson

/s/ Drew H. Wrigley  
DREW H. WRIGLEY  
United States Attorney

JJO/kt